

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORY OF
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS CRUM
(RIAA/USPS-T28-4)

The United States Postal Service hereby provides the response of witness Moeller to the following interrogatory of the Recording Industry Association of America: RIAA/USPS-T28-4, filed on September 17, 1997, and redirected from witness Crum.

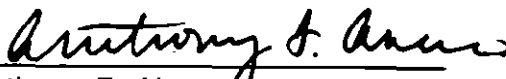
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

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October 1, 1997

U.S. POSTAL SERVICE WITNESS MOELLER RESPONSE TO
INTERROGATORY FROM THE RECORDING INDUSTRY
ASSOCIATION OF AMERICA, REDIRECTED FROM WITNESS CRUM

RIAA/USPS-T28-4. In the process of developing the proposal for the 10 cents per piece surcharge on Standard (A) Parcels, were alternative pricing mechanisms (e.g. piece and pound rate increases) explored to provide differential pricing for parcels?

a. If your answer is affirmative, please describe each alternative and explain why the 10 cents per piece was selected over each alternative.

b. If your answer is negative, why not?

RESPONSE

a-b. As described in my testimony at page 12, line 17, through page 13, line 7, the Postal Service is proposing the per-piece surcharge in order to avoid unwarranted complication of the rate structure. Although other alternatives were proposed by UPS in Docket No. MC95-1, no other alternatives were explored in preparation for this docket.

DECLARATION

I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


JOSEPH D. MOELLER

Dated: October 1, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anthony F. Alverno

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